

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Draft Permit No. V-97-048

LEGGETT PARTNERS, L.P.
SIMPSONVILLE, KENTUCKY

JIM MORSE REVIEWER

SOURCE DESCRIPTION:

Leggett coats components for chairs at the Simpsonville, KY plant. The parts are washed in caustic solution then prepared for painting by coating with a phosphate solution. Parts are then hung on hooks and dipped in paint. They are dried in a bake oven and then waxed for appearance. The hooks used in dipping are periodically loaded into a pyrolytic burnoff oven to remove accumulated paint.

COMMENTS:

The affected facility at this source is the paint dip tank. There is no control for VOC's and so it is assumed that 100% of the VOC's in the paint is emitted to the atmosphere. Eight percent by weight of the currently used coating is a regulated HAP (glycol ether). The source states that they can only operate the dip tank 7200 hours per year due to maintenance considerations. This means that the source does not have the capability to emit 250 tons of VOC. Assuming this, the source will be simply a major Title V source, limited only by the physical limitations of the equipment and the constraints of Regulation 401 KAR 59:225, New miscellaneous metal parts and products surface coating operations. The source will be exempted from the requirements of Section 3 due to the use of a paint containing less than 3.0 lb/gal of VOC, as per Section 6(c).